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Attorneys for Third-Party Plaintiff  
GLASFORMS, INC., a California corporation

UNITED STATES DISTRICT COURT  
NORTHERN DISTRICT OF CALIFORNIA  
SAN JOSE DIVISION

DONG AH TIRE & RUBBER CO., LTD.,  
a Korean Corporation,

Plaintiff,

v.

GLASFORMS, INC., a California  
corporation,

Defendant/Third-Party  
Plaintiff.

v.

CTG INTERNATIONAL (NORTH  
AMERICA) INC., an Indiana Corporation;  
TAISHAN FIBERGLASS, INC., a  
corporation organized under the laws of the  
People's Republic of China,

Third-Party Defendants.

CASE NO. C 06-03359 JF  
(Consolidated With Case No. C 06-00213 JF)

**STIPULATION SETTING AMENDED  
PRETRIAL SCHEDULE AND  
[PROPOSED] ORDER THEREON**

1 This stipulation is entered into between third-party plaintiff Glasforms, Inc.  
2 (“Glasforms”), third-party defendant CTG International (North America) Inc. (“CTG”), and third-  
3 party defendant Taishan Fiberglass, Inc. (“Taishan”), by and through their respective counsel of  
4 record.

### 5 **RECITALS**

6 WHEREAS, by stipulation and order of the Court dated August 27, 2007 (Document 43),  
7 the current fact discovery cut-off in these consolidated cases is December 15, 2007;

8 WHEREAS Glasforms and Plaintiff Dong Ah Tire & Rubber, Co. Ltd. (“Dong Ah”) have  
9 reached a settlement of Dong Ah’s claims against Glasforms and, therefore, Dong Ah is not a  
10 necessary signatory to this stipulation;

11 WHEREAS several depositions remain to be taken and completed in this case, including  
12 depositions of Glasforms personnel (some of whom reside in Birmingham, Alabama), the  
13 deposition of a CTG employee who is expected to return to California from China in early  
14 February, and a Taishan employee who resides in China and who must still obtain the necessary  
15 papers from the Chinese government allowing him to travel to California for deposition as per the  
16 parties’ agreement;

17 WHEREAS due to witness and counsel unavailability in December and parts of January,  
18 in part due to the December holiday season, the parties anticipate needing until February 29, 2008  
19 to complete the above-referenced depositions;

20 WHEREAS, so that the parties may complete pending fact discovery in this case,  
21 including the above-referenced depositions, prior to proceeding to expert disclosures and other  
22 pre-trial matters, Glasforms, CTG, and Taishan have agreed to enter into this stipulation to extend  
23 the fact discovery cut-off and the remaining pre-trial deadlines approximately two (2) months as  
24 described below;

25 WHEREAS, with respect to the subject of potential new discovery requests not already  
26 propounded and necessitated by newly discovered information, the parties agree that they shall  
27 each have the same rights going forward that they would otherwise have had if the fact discovery  
28 period ended on the original cut-off date of December 15, 2007 (i.e., by entering into this

1 Stipulation, no party hereto waives any rights they may have to propound such additional  
2 discovery pursuant to the agreement of the parties or Court order for good cause);

3 NOW, THEREFORE IT IS HEREBY AGREED AND STIPULATED by and between  
4 Glasforms, CTG, and Taishan, by and through their respective counsel of record, and subject to  
5 Court approval, that the Pretrial Schedule previously approved by the Court should be amended  
6 and that the trial date and pretrial deadlines be re-set as follows:

<u>Event</u>	<u>Date Set</u>
Cut-Off For Already Pending Fact Discovery	February 29, 2008
Exchange Expert Disclosures/Reports	March 3, 2008
Last Day to File Dispositive Motions	March 17, 2008
Exchange Rebuttal Expert Disclosures/Reports	April 4, 2008
Expert Discovery Cut-Off	May 2, 2008
Final Witness Lists	May 2, 2008
Motions in Limine	May 19, 2008
Oppositions to Motions in Limine and Trial Briefs	June 2, 2008
Pretrial Conference	June 27, 2008
Jury Trial (2 week estimate)	July 7, 2008

18 IT IS RESPECTFULLY REQUESTED that the Court issue an Amended Pretrial  
19 Scheduling Order conforming to the schedule set forth above based upon this Stipulation of the  
20 parties.

21 IT IS SO STIPULATED:

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1 Dated: December 18, 2007

HOPKINS & CARLEY  
A Law Corporation

2  
3  
4 By: \_\_\_\_\_/s/  
Robert A. Christopher  
Tod C. Gurney  
Attorneys for Defendant/Third-Party  
5 Plaintiff GLASFORMS, INC.  
6

7 Dated: December 18, 2007

CAMPBELL, WARBURTON,  
FITZSIMMONS, SMITH, MENDELL  
&PASTORE

8  
9  
10 By: \_\_\_\_\_/s/  
J. Michael Fitzsimmons  
Lisa Jeong Cummins  
Attorneys for Third Party Defendant  
11 CTG INTERNATIONAL (NORTH  
12 AMERICA) INC.

13 Dated: December 18, 2007

BAKER & DANIELS, LLP

14  
15 By: \_\_\_\_\_/s/  
David K. Herzog  
April E. Sellers  
Attorneys for Third-Party Defendant  
16 TAISHAN FIBERGLASS, INC.  
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18 IT IS SO ORDERED:

19 Dated: 12/20, 2007

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HONORABLE JEREMY FOGEL  
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PURSUANT TO GENERAL ORDER NO. 45,

I, Tod C. Gurney, the ECF User transmitting and filing this Stipulation Setting Amended Pretrial Schedule and [Proposed] Order Thereon, attest that I have obtained the concurrence of April Sellers, and Lisa Cummins on this filing.

I declare the foregoing under the penalty of perjury.

Dated: December 18, 2007

HOPKINS & CARLEY  
A Law Corporation

By: \_\_\_\_\_/s/\_\_\_\_\_  
Tod C. Gurney  
Attorneys for Third-Party Plaintiff,  
GLASFORMS, INC.